



## 2022 Qualified Allocation Plan: Changes Summary

Posted October 6, 2021  
Updated October 25, 2021

This document is intended to support public review of the second draft of the 2022 QAP by describing:

- Substantive changes proposed
- DCA-commissioned clarity editing incorporated in the draft

Please note:

- **(Revised)** indicates a proposal that has been substantively changed from draft one to draft two.
- **(New)** indicates a proposal that was not in the previously published first draft.

### Substantive Changes to Core Plan

Section	Proposed Changes
<b><i>9% Round Set Asides</i></b>	<p>Establish new “HUD Rental Assistance Set Aside” in addition to the pre-existing Housing Tax Credit and RAD set asides.</p> <p><b>(Revised)</b> See <i>Financing Resources – HOME Loans</i> for 9% Credit set aside updates outside of the annual 9% Competitive Round.</p>
<b><i>Tax Credit Administration</i></b>	<p><u>Tax Credit Pricing:</u></p> <ul style="list-style-type: none"> <li>• Establish restrictions on credit pricing adjustments.</li> </ul>
<b><i>4% Federal Credit – Bond Financed Projects</i></b>	<p><u>Application limitations:</u></p> <ul style="list-style-type: none"> <li>• Two applications per qualified Developer.</li> <li>• Joint ventures between two fully Qualified Developers may submit three applications.</li> </ul> <p><u>Award Limitation:</u></p> <ul style="list-style-type: none"> <li>• 2 awards per qualified developer.</li> </ul>
<b><i>Financing Resources – HOME Loans</i></b>	<p><b>(Revised)</b> Establish set aside for a development proposing rehabilitation of Naturally Occurring Affordable Housing funded with both 9% Credits and HOME.</p> <p>Note: DCA also proposes releasing a separate NOFA to preserve USDA properties with HOME funds only.</p>
<b><i>Submission Requirements and Award Limitations</i></b>	<p><u>Pre-determinations and Waivers:</u></p> <ul style="list-style-type: none"> <li>• Require Accessibility waivers at Pre-Application</li> </ul>

	<p><u>9% Round Award Limitations:</u></p> <ul style="list-style-type: none"> <li>• <b>(New)</b> Increase project limitations and development interest limitations by 15%.</li> <li>• Establish award limits for new preservation set asides.</li> </ul>
<b><i>DCA Pre-Application Fees and Deadline Schedules</i></b>	Require separate Qualification Determination fee for any changes in Project Team.

### Substantive Changes to Threshold Criteria

Section	Proposed Changes
<b><i>Applicability of Threshold Criteria</i></b>	Denotes Threshold submission requirements based on application type (9% or 4%).
<b><i>Cost Limits</i></b>	<p>Proposal to remove this section.</p> <p><b>(New clarification)</b> Please note that removing this section may increase cost-related adjustments and clarifications under <i>Threshold</i>, section <i>Project Feasibility</i>, subsection <i>DCA Analysis of Feasibility During the Competitive Round</i>.</p>
<b><i>Environmental Requirements</i></b>	Require submitted Phase I Report to be issued no more than 60 days after site reconnaissance.
<b><i>Building Sustainability</i></b>	Add Green Building Initiative's <i>Green Globes</i> program as additional option under subsection B. Sustainable Building Certification.
<b><i>Eligibility for Credit Under the Preservation Set Asides</i></b>	Establish eligibility criteria and submission requirements for the Preservation Set Asides.

### Substantive Changes to Scoring Criteria

Section	Proposed Changes
<b><i>Quality Education Areas</i></b>	<ul style="list-style-type: none"> <li>• <b>(Revised)</b> Add third performance indicator option for schools: average annual CCRPI improvement for schools in the top 75% of CCRPI scores.</li> <li>• <b>(Revised)</b> Allow recently established schools to utilize cluster-level data.</li> </ul>
<b><i>Community Transformation</i></b>	<b>(New)</b> Allow community-based developers to demonstrate qualifications with partnerships outside of Georgia.

<i>Stable Communities</i>	Allow applications in a census tract without data for a metric to use the value of the nearest census tract with data.
<i>Internet Access</i>	Award points to Metro Pool applications based on commitment to provide free high-speed internet/broadband service for each unit.
<i>Minority and Women-Owned Business Engagement</i>	<p>Award points based on engagement with certified minority- or women-owned businesses in the Housing Tax Credit industry. Options cover:</p> <ul style="list-style-type: none"> <li>• <b>(Revised)</b> Engage and report on such efforts for the development</li> <li>• <b>(Revised)</b> Previous successes in contracting</li> <li>• <b>(Revised)</b> Qualifying member of the project team</li> </ul> <p>Certification programs currently under consideration include:</p> <ul style="list-style-type: none"> <li>• <a href="#">Georgia Department of Administrative Services: Minority Business Enterprise Certification</a></li> <li>• <a href="#">Georgia Department of Transportation Disadvantaged Business Enterprise</a></li> <li>• <a href="#">National Minority Supplier Development Council</a></li> </ul>
<i>Enriched Property Services</i>	<p>Award points based on either of the following:</p> <ul style="list-style-type: none"> <li>• Sponsor has received a CORES certification for resident services coordination and delivery</li> <li>• Agreement to contract with a CORES-certified entity</li> </ul>
<i>Exceptional Nonprofit/Public Housing Authority</i>	In response to increases in nonprofit development capacity in Georgia, proposal to remove this section.
<i>Favorable Financing</i>	Allow community land trusts as eligible lessors for subsection B. Long-term Ground Lease.
<i>Historic Preservation</i>	<p><u>Historic Tax Credit Proceeds:</u></p> <ul style="list-style-type: none"> <li>• <b>(New)</b> Require “certified rehabilitation” status to qualify.</li> </ul>
<p><i>Integrated Supportive Housing</i></p> <p><i>(replaces Underserved Populations)</i></p>	<p>Awards points based on one of the following options:</p> <ul style="list-style-type: none"> <li>• Agreement to accept DCA PBRA for family properties</li> <li>• Application has secured non-DCA supportive housing PBRA</li> <li>• Tenant Selection Preference*</li> </ul> <p>Additionally, all applicants are eligible to claim points through a fourth option:</p> <ul style="list-style-type: none"> <li>• No adverse history in contracting with DCA Section 811 PBRA</li> </ul> <p>* This option is in the 2021 QAP, and DCA does not propose substantively changing its language at this time.</p>

<i>Affordability Loss Risk</i>	Award points based on risk that residents at an existing property will face rent increases or displacement absent a Housing Tax Credit award.
<i>PBRA Contracts</i>	<b>(Revised)</b> Award points based on the number of units assisted by federally-funded project-based rental assistance.
<i>Property Restrictions and Age</i>	Adjusted points and thresholds for two pre-existing preservation scoring sections under the 2021 QAP: <ul style="list-style-type: none"> <li>• Expiration timeframe for Housing Tax Credit restrictions</li> <li>• Property age</li> </ul>
<i>Property Size</i>	Proposal to remove section.
<i>Readiness to Proceed for 4% Credit Applications</i>	Proposal to remove section.

**Note: Proposed Non-Substantive QAP Edits**

DCA contracted with Novogradac to propose non-substantive edits to the QAP that could help to improve its accessibility. The first draft of the 2022 QAP includes many though not all edits included in the originally released version ([click here](#) to view Novogradac’s original edits).

The types of proposed edits that DCA has accepted at this time encompass:

- Sentence-level editing to improve readability
  - Consolidating related information in one place
  - Removing information where possible to ease the process of identifying substantive policy.
- Examples include text that was deemed to be:
- A reiteration of federal or state law
  - Repeated elsewhere in the QAP or in another DCA document
  - Not a rule, requirement, or allocation criterion

At this time, DCA anticipates phasing in the proposed edits to allow more time to discuss their implications, with the below expected timeframe.

2022 QAP	<ul style="list-style-type: none"> <li>• Core Plan</li> <li>• Scoring Criteria</li> </ul>
2023 QAP	<ul style="list-style-type: none"> <li>• Threshold Criteria</li> <li>• Compliance Addendum</li> </ul>